

1 PITE DUNCAN, LLP
 2 STEVEN W. PITE (NV Bar #008226)
 3 EDDIE R. JIMENEZ (NV Bar #10376)
 4 4375 Jutland Drive, Suite 200
 5 San Diego, CA 92117
 6 Telephone: (702) 413-9692
 7 Facsimile: (619) 590-1385
 8 E-mail: ecfnvb@piteduncan.com

E-Filed on 6/25/09

1 ABRAMS & TANKO, LLLP
 2 MICHELLE L. ABRAMS (NV Bar #005565)
 3 3085 S. Jones Blvd., Suite C
 4 Las Vegas, NV 89146

5
 6 Attorneys for GMAC MORTGAGE, LLC, its successors and/or assigns
 7
 8
 9

10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEVADA

12 In re	Bankruptcy Case No. 09-20159-lbr
13 DEBRA L. CABRALES AND JAMES C.	Chapter 13
14 CABRALES, 15 Debtor(s).	GMAC MORTGAGE, LLC'S REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS

16
 17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL

18
 19 INTERESTED PARTIES

20 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
 21 Mortgage, LLC, its successors and/or assigns, hereby requests special notice of all events relevant
 22 to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the
 23 above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
 24 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
 25 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
 26 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
 27 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
 28 above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3 EDDIE R. JIMENEZ
4 PITE DUNCAN, LLP
5 4375 Jutland Drive
6 Suite 200
7 San Diego, CA 92117

8 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
9 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
10 waiver of the within party's:

11 a. Right to have any and all final orders in any and all non-core matters entered only
12 after de novo review by a United States District Court Judge;

13 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
14 whether or not the same be designated legal or private rights, or in any case, controversy or
15 proceeding related hereto, notwithstanding the designation or not of such matters as "core
16 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
17 to statute or the United States Constitution;

18 c. Right to have the reference of this matter withdrawn by the United States District
19 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

20 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
21 which this party is entitled under any agreements at law or in equity or under the United States
22 Constitution.

23 All of the above rights are expressly reserved and preserved by this party without
24 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
25 or by any other participation in these matters.

26 Dated: June 26, 2009

27 /s/ Eddie R. Jimenez
28 4375 Jutland Drive
Suite 200
San Diego, CA 92117
(702) 413-9692
NV Bar #10376
Attorney for GMAC MORTGAGE, LLC, its
successors and/or assigns

1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND
3 SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on June 26, 2009.

4 Service was accomplished by the method and to the following as indicated:

5 BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

6 Debra L. Cabrales
James C. Cabrales
7 444 Colorful Rain Ave
North Las Vegas, NV 89031

8 George Haines
9 Haines & Krieger, L.L.C.
1020 Garces Ave., Ste 100
10 Las Vegas, NV 89101

11 Kathleen A. Leavitt
201 Las Vegas Blvd. South
12 Suite 200
13 Las Vegas, NV 89101

14 U.S. Trustee
15 Department of Justice
300 Las Vegas Boulevard, So.
16 Suite 4300
Las Vegas, NV 89101

17 I declare under penalty of perjury that the foregoing is true and correct and that this
18 declaration was executed on June 26, 2009, at San Diego, California.

20 /s/ Mary K. Arnold

21
22
23
24
25
26
27
28